

May 24, 2024

VIA E-MAIL AND ECF

Honorable Analisa Torres
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 15D
New York, New York 10007

Re: *Eugene F. Mason, Jr. v. Richard S. Meisner, Esq. et al.*
No.: 1:24-cv-02810 (AT)

Dear Judge Torres:

This firm represents the Plaintiff, Eugene F. Mason, Jr. (“Mr. Mason”), in the above-captioned matter. We received Defendants’ Pre-Motion Letter dated May 20, 2024, regarding their intention to move, pre-answer, to dismiss Mr. Mason’s causes of action for breach of contract, breach of fiduciary duty, and breach of the implied covenant of good faith and fair dealing. Judge Torres previously granted Defendants’ request, upon consent, for an extension of time until May 31, 2024 to respond to the Complaint.

Defendants’ Pre-Motion Letter requests a formal response within five (5) days pursuant to Judge Analisa Torres’ Individual Practices in civil matters. Given the upcoming Memorial Day holiday, Mr. Mason respectfully requests an extension of time until June 7, 2024 to respond to Defendants’ Pre-Motion Letter.

Given the above adjournment request, Mr. Mason hereby consents to a further two (2) week extension of Defendants’ time to respond to the Complaint, which would be due by June 21, 2024. Mr. Mason has conferred with counsel for the Defendants, who consent to this adjournment request.

Mr. Mason wishes to thank the Court for its time and attention to this matter.

Respectfully submitted,



Rachael Marvin, Esq.

Cc: Matthew Feinberg, Esq. at mfeinberg@goldbergsegalla.com